



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMR/GN
F. # 2018R02232

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 7, 2023

By Electronic File Sharing and ECF

Henry E. Mazurek, Esq.
Ilana Haramati, Esq.
Jason Ser, Esq.
Meister Seelig & Fein LLP
125 Park Avenue, 7th Floor
New York, NY 10017

Re: United States v. Jacob Daskal
Criminal Docket No. 21-110 (NGG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Please note that the discovery materials marked with an asterisk (*), are designated "Sensitive Discovery Material" and must be handled pursuant to the Protective Order entered by the Court on April 9, 2021. See Dkt. No. 18. Please also note that a significant portion of the below materials were previously provided to you by the Kings County District Attorney's Office. The government also requests reciprocal discovery from the defendant.

Enclosed please find:

- * Contents of a Samsung cellular telephone belonging to Jane Doe, Bates numbered DASKAL001702 and designated as Sensitive Discovery Material; please note that on November 10, 2022, the government previously provided a video created in or about May 2018 of excerpts of this phone, Bates-numbered DASKAL001653, but incorrectly described the contents of the video as excerpts of a Red LG Phone.
- Records from Verizon Wireless, for telephone number (347) 678-7111, Bates numbered DASKAL001703-DASKAL001722;
- A report on the defendant's arrest from the Federal Bureau of Investigation, Bates numbered DASKAL001723-DASKAL001740; please note that a

recording of the statements referred to in the report was previously provided to you in April 2021, Bates-numbered DASKAL000001.

- A photograph of the defendant from the New York Department of Motor Vehicles, Bates numbered DASKAL001741;
- A photograph of a school uniform, Bates numbered DASKAL001742;
- Reports from the Federal Bureau of Investigation regarding records previously provided to you, Bates numbered DASKAL001743-DASKAL001745;
- Notes and reports pertaining to the search of the defendant's residence by the New York City Police Department, Bates numbered DASKAL001746-DASKAL001757;
- Photographs of the defendant's residence, Bates numbered DASKAL001758-DASKAL001792;
- Crime Scene Unit photographs, Bates numbered DASKAL001793(1) through DASKAL001793(87).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Erin Reid
Erin Reid
Genny Ngai
Assistant U.S. Attorney
(718) 254-6361

Enclosures

cc: Clerk of the Court (NGG) (by ECF) (without enclosures)